

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

P.R. POLICE DEPARTMENT &
COMMONWEALTH OF P.R.,

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION REGARDING "MOTION SUBMITTING THIRD REPORT OF THE FEDERAL
MONITOR" AT DOCKET NO. 1715

COMES NOW Co-Defendant, **Puerto Rico Police Department** (hereinafter "**Co-Defendant**" or "**PRPD**"), through its undersigned attorneys, and, very respectfully states, alleges, and requests:

1. On March 21, 2021, John Romero, in his capacity as Federal Police Monitor, filed "Motion Submitting Third Report of the Federal Monitor". (Docket No. 1715). On March 22, 2021, this Honorable Court noted the filing of the aforementioned report. (Docket No. 1716).

2. Via the present Motion, the PRPD informs the Court of its intent of filing the Co-Defendant's response to the TCA's final report, in compliance with the conditions and time frame established at Paragraph 252 of the Agreement for the

Sustainable Reform of the Puerto Rico Police Department, ("Agreement"). (See, Docket No. 60)¹.

3. This Honorable Court must note that, per Paragraph 252, on March 5, 2021, the PRPD timely commented and submitted considerable comments and revisions to the draft document of the third six-month report of the Federal Monitor.

4. Therefore, as mentioned above and, per the provisions of Paragraph 252, the PRPD hereby informs and requests this Honorable Court to note that Co-Defendant will submit its corresponding responses to the final report within the 30 day period established therein that paragraph of the Agreement.

WHEREFORE, Co-Defendant respectfully requests that this Court take notice of the PRPD's intent of filing the Co-Defendant's response to the TCA's final report.

In San Juan, Puerto Rico, this 27th day of March, 2021.

CERTIFICATE OF SERVICE

The undersigned hereby certify that on March 27, 2021, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

¹ Paragraph 252 reads as follows: "[T]he TCA shall provide a copy of the six-month reports to the Parties in draft form within 15 days after the end of the reporting period. The Parties shall have fifteen calendar days upon receipt of the draft report to allow the Parties to informally comment on the draft reports. The TCA shall consider the Parties' responses and make appropriate changes, if any, and shall file the final report with the Court within 45 days of the end of the review period. DOJ and PRPD may file responses to the TCA's final report within 30 days."

s/Marta L. Rivera Ruiz
MARTA L. RIVERA RUIZ
USCD-PR NO. 221201
mrivera@cnr.law

s/Rafael Barreto-Solá
RAFAEL BARRETO-SOLÁ
USDC PR: 211801
rbarreto@cnr.law

s/Gabriel A. Peñagaricano
GABRIEL A. PEÑAGARICANO
USDC PR: 212911
gpenagaricano@me.com

CANCIO, NADAL & RIVERA, P.S.C.
P.O. Box 364966
San Juan, PR 00936-4966
Ave. Muñoz Rivera 403
Hato Rey, Puerto Rico 00918-1145
Tel. (787) 767-9625
Fax: (787) 622-2238